

EXHIBIT 24

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

JOHN DOE d/b/a SUNPORNO.COM,
MONIKER PRIVACY SERVICES
REGISTRANT 2125963, and DOES 1-50

Defendants

Case No. 11-cv-62107-KMW

**DECLARATION OF ERIKA DILLON IN
SUPPORT OF COMPLAINT AND
REQUEST FOR INJUNCTIVE RELIEF
AND JURY TRIAL**

I, Erika Dillon, declare under penalty of perjury that:

1. I am over the age of 18 and am a resident of the State of Nevada.
2. I have personal knowledge of the facts herein, and if called as a witness, could testify competently thereto.
3. I am employed by Liberty Media Holdings, LLC in Las Vegas, Nevada as an in-house paralegal.
4. I thoroughly reviewed the sunporno.com website to determine the functionality of the site and locate what, if any, posted videos violated Liberty's copyrights. An initial search for "CorbinFisher" yielded five results and prompted further searching.
5. A true and correct copy of the initial search is attached to the complaint as Exhibit A.
6. Through this initial search and other subsequent searches, I found six videos containing Liberty's copyrighted work.
7. True and correct copies of screenshots of these works posted on sunporno.com are attached to the complaint as Exhibits B through G.

8. I also reviewed the profiles of the members that are attributed as posting Liberty's copyrighted works. These profiles contain a section for age and gender that are provided by the user. The profiles also contain the date the member joined the website, how many videos the member has watched on the website, how many videos the member has uploaded to the website and how many unique hits, or different individuals, have viewed the videos that member has uploaded. This additional information is content created and updated by the site and is not information that an individual member can change.

9. True and correct copies of these profiles are attached to the complaint as Exhibit L.

10. Four of the six users that have posted Liberty's copyrighted materials (Casta, advert, likis and Triksster) have profiles that list "01 January 1970" as their join dates. After signing up for and examining the profile options on the site, I have determined that it is not within the capabilities of a normal user to be able to modify their join dates.

11. I base the conclusion that members cannot individually adjust their join dates based upon my personal knowledge and experience in serving as a forum administrator for a message board that contained profiles of a similar nature. While the kind of programming and set up may not be exactly the same, these kinds of platforms generally restrict the adjustment of site-supplied content (like the join date) to administrators, moderators, webmasters, or other enforcers of site policy.

12. These four members have also, unlike the vast majority of other members, not viewed a single video but have uploaded thousands.

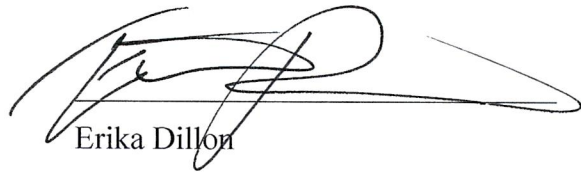
13. Further, the above four users also lack listings for the "connections" and "favorite video" features common to most regular member profiles on the site.

14. The profile of user Casta also includes an inquiry from a user with the name of "clefnks" requesting to know why a video that clefnks attempted to upload was denied.

15. Based upon this information, it seems likely that these four users have site authorization above that of regular members or are somehow connected to site administrators.

16. In further searches of www.sunporno.com, I have found no listing in information provided to members that defines or threatens punishment for repeat copyright infringers. There is no information to this effect provided as a welcome message to new members, in the FAQ on the website, nor in the limited Terms of Services agreed to upon registration.

Signed under penalty of perjury on September 23, 2011 in Las Vegas, NV



Erika Dillon

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that no service is required of the foregoing, as no other party has made an appearance in this action.

Dated: September 27, 2011

s/ Marc J. Randazza
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